#### UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS

KIMBERLY KJESSLER, KLAIRE RUECKERT, LAURA BRALEY, TIMOTHY HAYDEN and SUMMER LANG, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

ZAAPPAAZ, INC., AZIM MAKANOJIYA, NETBRANDS MEDIA CORP., MASHNOON AHMED, GENNEX MEDIA, LLC, BRANDECO, L.L.C., AKIL KURJI, CUSTOM WRISTBANDS INC., and CHRISTOPHER ANGELES,

Defendants.

Civil Action No. 4:18-cv-0430 (Consolidated)

# DECLARATION OF BRUCE W. STECKLER IN SUPPORT OF MOTION FOR AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES

- I, Bruce W. Steckler, declare as follows:
- 1. I am a partner at Steckler Gresham Cochran PLLC. I submit this declaration in support of Plaintiff's motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the above-captioned action (the "Action").
  - 2. My firm served as Plaintiffs' Local Counsel in the Action.
- 3. The schedule attached as Exhibit 1 sets forth my firm's total hours and lodestar, computed at historical rates, for the period of inception of the case through and including today's date. The total number of hours spent by my firm during this period was 5.8, with a corresponding total lodestar (at historical rates) of \$3,999.00. This schedule was prepared from contemporaneous records prepared and maintained by my firm. In connection with representing the Plaintiffs in the

Action, my firm did the following: reviewing and developing the legal theories of the case for the

drafting and revising initial pleadings; coordinating case strategy; and advising and assisting on filings

for Plaintiffs' counsel. The lodestar amount reflected in Exhibit 1 is for work performed by attorneys

and professional staff at or affiliated with my firm for the benefit of the Class. The hourly rates for

the attorneys and professional staff in my firm reflected in Exhibit 1 are the usual and customary

hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has no unreimbursed costs and expenses in connection with the prosecution

of the Action from inception of the case through and including today's date. I declare under penalty

of perjuty under the laws of the United States that the foregoing is true and correct.

Bryge W. Steckler; Partner

1/20 Hillcrest Road, Suite 1045

Dallas, TX 75230 Tel: 972-387-4040

Fax: 972-387-4041

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## EXHIBIT 1 TO THE DECLARATION OF BRUCE W. STECKLER IN SUPPORT OF MOTION FOR AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES

#### Reported Hours and Historical Lodestar

Inception Through Today's Date

Name	Position	Hours	Historical Rate	Lodestar
Bruce Steckler	Partner	2.0	875.00	\$1,750.00
Kirstine Rogers	Partner	2.9	715.00	\$2,073.50
Jamie Baciak	Paralegal	.9	195.00	\$175.50
				<u> </u>
TOTAL		5.8		\$3,999.00